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9 IN THE UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
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13 Plaintiff,
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15 v.
16 STEVEN LAWRENCE ROBINSON, and,
NATHANIEL OPONDO HUBBERT,
17 Defendants.

CASE NO. 2:20-CR-00123-JAM

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: September 1, 2020
TIME: 9:30 a.m.
COURT: Hon. John A. Mendez

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18 **STIPULATION**

- 19 1. By previous order, this matter was set for status on September 1, 2020.
20 2. By this stipulation, defendants now move to continue the status conference until October
21 27, 2020 at 9:30 a.m., and to exclude time between September 1, 2020, and October 27, 2020, under
22 Local Code T4.
23 3. The parties agree and stipulate, and request that the Court find the following:
24 a) The government has represented that the discovery associated with this case
25 includes over eight gigabytes of evidence in electronic form, including police reports, pictures,
26 multiple hours of video footage, laboratory reports, search warrants, and a forensic cellular
27 phone report. All of this discovery has been either produced directly to counsel and/or made
28 available for inspection and copying.
b) Counsel for defendants desire additional time consult with their clients, to review

1 the existing discovery, to discuss potential resolutions with their clients, and to otherwise prepare
2 for trial.

3 c) Counsel for defendants believe that failure to grant the above-requested
4 continuance would deny them the reasonable time necessary for effective preparation, taking into
5 account the exercise of due diligence.

6 d) The government does not object to the continuance.

7 e) Based on the above-stated findings, the ends of justice served by continuing the
8 case as requested outweigh the interest of the public and the defendant in a trial within the
9 original date prescribed by the Speedy Trial Act.

10 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
11 et seq., within which trial must commence, the time period of September 1, 2020 to October 27,
12 2020, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
13 T4] because it results from a continuance granted by the Court at defendant's request on the basis
14 of the Court's finding that the ends of justice served by taking such action outweigh the best
15 interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: August 26, 2020

McGREGOR W. SCOTT
United States Attorney

/s/ ADRIAN T. KINSELLA
ADRIAN T. KINSELLA
Assistant United States Attorney

Dated: August 26, 2020

/s/ MEGAN HOPKINS
MEGAN HOPKINS
Assistant Federal Defender
Counsel for Defendant
STEVEN LAWRENCE ROBINSON

Dated: August 26, 2020

/s/ KRESTA DALY
KRESTA DALY
Counsel for Defendant
NATHANIEL OPONDO HUBBERT

FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED this 26th day of August, 2020.

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE